

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

PERIODIC REPORTING
(PROPOSAL FOUR)

Docket No. RM2016-12

**FIRST MOTION OF THE UNITED STATES POSTAL SERVICE
SEEKING ISSUANCE OF INFORMATION REQUESTS TO
UNITED PARCEL SERVICE**
(October 20, 2016)

To support its October 17th Comments opposing Proposal Four, UPS submitted a large body of public and nonpublic technical material. In accordance with 39 CFR § 3050.11(c), the Postal Service requests that the Commission pose to UPS the appended questions and requests for information. Responses on these subjects would allow the Commission and interested parties to better evaluate the merits of the UPS arguments.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorney:

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October 20, 2016

1. The program entitled “weighted rpw.R” includes the following statement: “Input and clean RPW data”

a. Please provide a description of the steps taken to “clean” the RPW data.

b. Please provide a table or other computer output indicating how many observations were “cleaned.”

2. The program entitled “weighted rpw.R” includes the following statement: “RESTRICT TO 2015 VOLUMES”

Please confirm that the “restriction” implied by this statement applies only to calculating the “weights” subsequently used in the program. If you do not confirm, please explain what the restriction to 2015 volumes does.

3. The program entitled “weighted rpw.R” includes the following statement:

```
weight$wintrascf<- weight$intrascf_volume/ weight$sumyear  
weight$winterscf<- weight$interscf_volume/ weight$sumyear  
weight$wintrandc<- weight$intrandc_volume/ weight$sumyear  
weight$winterndc<- weight$interndc_volume/ weight$sumyear
```

a. Please provide definitions for the variables weight\$intrascf, weight\$interscf, weight\$intrandc and weight\$interndc

b. Please provide definitions for the variables weight\$intrascf_volume, weight\$interscf_volume, weight\$intrandc_volume, and weight\$interndc_volume

c. Please provide a definition for the variable weight\$sumyear.

d. Please confirm that none of the above listed variables appear in any of the output data sets provided in UPS-LR-RM2016-12/NP1. If you confirm, please provide the values for these variables. If you do not confirm, please indicate where in UPS-LR-RM2016-12/NP1 the values for these variables appear.

4. Please confirm that these are the values for Parcel Select volumes read into the program entitled “weighted rpw.R”

2010	1	82252.45
2010	2	60358.76
2010	3	62268.9
2010	4	63477.36
2011	1	104131.2
2011	2	74460.76
2011	3	80139.93
2011	4	84235.22
2012	1	134916.3
2012	2	241339.4

2012	3	282899.5
2012	4	278476.1
2013	1	359509.3
2013	2	308856.1
2013	3	305560.4
2013	4	313122
2014	1	415608.9
2014	2	346845.2
2014	3	355730.9
2014	4	365736.9
2015	1	515854.1
2015	2	442104.3
2015	3	443658.6
2015	4	475017.2

If confirmed, please also confirm that these values imply a greater than 200 percent year over year increase in Parcel Select volumes in quarters 2, 3 and 4 of FY2012. If you do not confirm, please provide the values for Parcel Select volumes read into the program entitled "weighted rpw.R".

5. The Excel workbook entitled "wvinterscf_rpw.csv appears to contain the following variable titles: sumCFMUproduct, sum_mailvol, sumwv, share,and sumrwv. Please provide definitions for each of these variables.

6. Please confirm that during the construction of the dataset entitled "quarterly volume and capacity.dta" all Testids with zero mail volumes were deleted. If not confirmed, please explain how Testids with zero mail volume were handled in the data set construction.

7. Please refer to page 12 of the report entitled "Report of Dr. Kevin Neels and Dr. Nicholas Powers to Accompany UPS Comments In Docket No. RM2016-12" where it states "We then multiplied the usage weight of each mail class by the corresponding piece counts contained in each quarter's public RPW reports,".

Please confirm that the values for these "usage weights" are not presented in the above mentioned report, or in the public UPS-LR-RM2016-12/1 or in the non-public UPS-LR-RM2016-12/NP1.

a. If confirmed, please provide these "useage weights."

b. If not confirmed please indicate where the "useage weights" are provided.

8. In the Excel workbook entitled "demonstrative volume capacity change.xlsx", in the sheet entitled "volchange," Column I appears to contain a variable entitled "use." Please provide a definition of this variable.